

COHEN & GREEN

July 11, 2022

Honorable Eric R. Komitee, U.S.D.J.
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

By Electronic Filing.

Re: Rudler v. MLA Law Offices, LTD et al., No. 1:19-cv-02170-ERK-LB

Dear Judge Komitee:

My firm represents Plaintiff in the matter above. I write jointly with Defendants to ask for a status conference in the case above.

By way of background, this case initially resolved in a So-Ordered Settlement the Court entered on November 5, 2020. Dkt. No. 83. The Court then decided an attorneys' fee motion pursuant to that settlement (Dkt. Nos. 88; 92), and entered a judgment (Dkt. No. 93) — which led to enforcement proceedings and post-judgment asset discovery. Ultimately, with a number of issues pending, the parties reached a second settlement — this time with a more explicit “agreed upon a Court-enforceable payment and enforcement structure” Dkt. No. 109 (Joint Motion) — which they asked the Court to review and So-Order. Dkt. Nos. 108-109.

Some deadlines in that Settlement are keyed to when (and if) the Court adopts the Settlement. *See, e.g.*, Dkt. No. 108 ¶ 4 (costs are due within 10 days of entry of the “Second Settlement”). But other deadlines are set to particular dates. *See, e.g., id.* ¶ 6 (first monthly payment is due July 15, 2022). Those dates begin this Friday. The parties are likely to disagree about whether payments on those dates are required absent the Court So-Ordering the settlement. Therefore, the parties respectfully request that the Court set a conference so that they may address any concerns the Court has about the Second Settlement.

We thank the Court for its time and attention.

Respectfully submitted,

/s/

J. Remy Green

Honorific/ Pronouns: Mx., they/ their/ them

COHEN & GREEN P.L.L.C.

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cc:

All relevant parties by ECF.